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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL RENO, ERIC KIEFABER,)	
DENNIS RHOADES, JASON HARRIS,)	CASE NO. 2:18-CV-840-APG-NJK
PREMIER TAMAYO, WILFREDO)	
ALLANIGUE, and ARIES BIHASA,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
WESTERN CAB COMPANY, HELEN)	
TOBMAN MARTIN, MARILYN)	
TOBMAN MORAN, JANIE TOBMAN)	
MOORE, MARTHA SARVER, and)	
JASON AWAD,)	
)	
Defendants.)	
)	

MOTION TO EXTEND TIME

Defendants, through their current counsel, move to extend the deadline to file the response to Plaintiffs' Motion For An Award Of Attorney's Fees And Costs Pursuant To The Court's ECF 268 Order (#280) be EXTENDED such that Defendants' response shall be due on **April 13, 2022**.

Defendants request an additional three court days to finalize and file their responsive brief. There has been recent motion / objection practice by Plaintiffs in this case, which has consumed significant time. Defense counsel routinely grants extensions and/or does not oppose motions to extend, which has occurred perhaps a couple dozen times in this case. On today's date, attempt was made by defense counsel to obtain stipulation from Plaintiffs for the extension, to no avail.

1
2 An additional three court days will allow the issues raised by Plaintiffs' motion to be heard on the
3 merits and in a manner conducive to orderly litigation of the claims.

4 Plaintiffs' motion (#280), to which extension is hereby requested, includes various exhibits
5 and information that was not previously submitted to defense counsel via meet-and-confer
6 procedures. Plaintiffs' motion seeks substantial attorney fees in costs, indeed over \$70,000.00, in
7 regard to only two motion filings. Such motion(s) were previously litigated elsewhere, which
8 eased the motion practice before this forum, which now requires review of the alleged duplicative
9 attorney fees being sought by Plaintiffs in this forum.
10

11 Currently, the matter is set for hearing on May 9, 2022,. This Motion allows for sufficient
12 time for a reply brief to be filed and for the filings to be reviewed prior to the hearing, this Motion
13 is limited to an extension of only a few business / court days, and the extension will allow for full
14 briefing and response such that the matter will be heard on the merits.
15

16 Dated: April 8, 2022.

17 LOVATO LAW FIRM, P.C.

18 **IT IS ORDERED that ECF No.**
19 **283 is GRANTED as**
20 **unopposed nunc pro tunc. See**
LR 7-2(d).

/s/ Mario Lovato
MARIO P. LOVATO
Nevada Bar No. 7427
Attorney for Defendants

21 **IT IS SO ORDERED**

22 **DATED:** 1:22 pm, May 06, 2022

23 

24
25 **BRENDA WEKSLER**
26 **UNITED STATES MAGISTRATE JUDGE**
27
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